

browser region" and cites Liles for that element. See Paper Number 12, page 3. To support this position, the Examiner cites Liles at column 5, line 34.

Independent Claims 10, 28 and 48

Applicants respectfully submit that the combination of Judson and Liles does not make the present invention obvious because neither Judson nor Liles teaches or suggests embedding a chat region within a browser region so that the chat and browser regions are simultaneously displayed as recited in independent claims 10, 28 and 48, as amended. The applicants acknowledge that real time, bi-directional chat has been taught in the prior art. However, none of the cited prior art contains any description whatsoever of a *chat region that is embedded in a browser region* as claimed in the present invention. While the Judson and Liles references do discuss browsers or chat applications, neither teaches the concept of a chat region embedded in the browser region.

Judson teaches a browser region with a synchronization mechanism, but does not at any point describe embedding a chat region within a browser region or visa versa. In fact, Judson does not address chat regions in any manner, and certainly does not suggest embedding a chat region within the browser region as claimed in the present invention. A review of Judson makes this clear.

The Examiner cites Judson at column 3, lines 34-37 for the proposition that Judson teaches a "chat region embedded in

a browser region." See Paper 12, page 3. However, Judson at column 3, lines 34-37 does not, in fact, describe a chat region in a browser region, but rather states that Figure 7 shows an "information object embedded" in a web page. This "information object" simply causes a static "comment" to arise when a link is activated. See column 6, lines 15-25. At column 6, lines 15-25 Judson describes a process of activating a link, accessing the information object and displaying a message. See FIGURE 3. This "message" is not a chat region where users can respond to one another within the chat region, but rather a static text comment that is simply read by the user. The "message" of Judson was not generated real-time by another and sent to the user and the user cannot respond to the "message." The Judson "message" is not a chat-type message at all. Unlike interactive chat where the messages are created real time posted on the chat region (and nearly all messages have different content), the Judson "message" is static and every user will see precisely the same information in the "message." Furthermore, there is no capability in Judson to "respond" to the message. The user simply reads the Judson static message while other processing is occurring. This comment field of Judson is simply not a chat region and the information object does not cause a chat region to appear within the browser region. It is a very different proposition to embed a chat region in a browser

region, as in the present invention, than to simply cause a static comment to appear in the browser region.

The purpose of Judson (to provide static text messages during certain click-through events) is entirely different from the purpose of the present invention (to provide real-time chat capability embedded within the browser region). Because of its very purpose, Judson has no reason to (and does not) address embedding a chat region in a browser region as claimed in the present invention. For example, using the invention of Judson, a user could use the browser (via a browser region) to go to a chat region and chat (inside the chat region), but a user could not use the Judson invention to either chat or browse from the same display (and even to perform these functions simultaneously) as claimed in the present invention.

Liles discloses a standard chat application with the added novelty of providing certain graphical chat capabilities through the presentation of avatars. Liles does not at any point describe embedding its chat region within a browser region or visa versa. In fact, Liles does not even address browsers, and certainly makes no suggestion of embedding a chat region within the browser. There is simply no browsing feature in the chat application of Liles.

In fact, the Examiner appears to cite Liles simply for the proposition of the chat region being "a bi-directional open communication." See Paper 12, page 3. Applicants agree

with the Examiner that "bi-directional chat" is prior art. However, chat *embedded* in the browser region, as recited in amended claims 10, 28 and 48, is not. Embedding the chat region in the browser region is not taught in Liles. In fact, the very motivation for Liles (i.e., the presentation of graphic in chat applications) points out that Liles has no intention of addressing (and does not address) embedding chat in a browser region.

As claimed in the present invention, the browser region is actually making room for the chat region in a shared real estate scenario so that both browser and chat functions can be displayed and can occur in the same region or window. In other words, the browser region is hosting the chat region within the browser region. Neither Judson nor Liles, nor any combination of the two, teaches or suggests this novelty of embedding the chat region within the browser region.

Dependent Claims 11, 29 and 49

Neither Judson nor Liles teaches or suggests allowing a user to concurrently process chat functions and browser functions from the same screen display as recited in claims 11, 29 and 49, as amended. As discussed, Judson shows static text appearing in a browser region (well known) and Liles shows standard chat region capability (well known), but neither teaches, suggests or even alludes to the concept of embedding the chat functionality within the browser region so that a user could perform either a chat function or a browser

function from the same screen. Neither Judson nor Liles allows a user to chose whether to perform browsing functions, chat functions, or both at the same time from the same screen.

Dependent Claims 13, 31 and 51

Neither Judson nor Liles teaches or suggests processing chat content using a chat server for display in the chat room and processing a document or other content using a browser server for simultaneous display in the browser region, as recited in amended Claims 13, 31 and 51. As discussed previously, Judson simply does not address chat regions. As for Liles, while it addresses chat regions, it utterly fails to address concurrent processing of chat content and browser content. The present invention allows the processing and display of both chat content in the chat region and browser content in the browser region at the same time from different servers. The Judson reference at column 8, lines 34-36, simply describes viewing static text messages while loading a web page to a browser, but does not in any way address the ability to simultaneously view and process both chat content and other content within the browser region. The Liles reference describes placing graphics in chat, but fails to discuss viewing other browser information in any way and certainly does not suggest how to view other browser information simultaneously with its chat content. As such, Claims 13, 31 and 51 are not suggested or taught in the cited prior art.

Dependent Claims 14, 32, 52

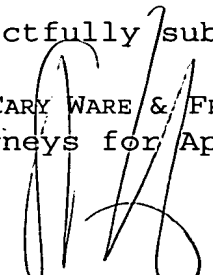
Neither Judson nor Liles teaches or suggests *linking* the chat client to the browser so that the chat client controls the content displayed in the browser region, as recited in Claims 14, 32 and 52. The present invention links the chat client to the browser using an interface so that the chat client controls the browser content. Thus, at the same time the chat region is being hosted on the browser region, the browser is being controlled by the chat client which is feeding back to the browser region what content should be shown in the browser region. For example, chat could be ongoing in the chat region, while a document or streaming video or other image is being shown in another frame within the browser region. According to Claims 14, 32 and 52, the browser region content is being determined by the chat client. Again, none of the cited prior art teaches or suggests this claimed element (as discussed, Judson does not address chat and certainly not a chat client that controls the content in the browser region and Liles does not discuss controlling browser content using its chat client).

Applicants have now made an earnest attempt to place this case in condition for allowance. For the foregoing reasons and for other reasons clearly apparent, Applicants respectfully request full allowance of Claims 10-65.

The Commissioner is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 50-0456 of Gray Cary Ware & Freidenrich, LLP.

Respectfully submitted,

GRAY CARY WARE & FREIDENRICH
Attorneys for Applicants


Steven Sprinkle
Reg. No. 40,825

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100 Congress Avenue
Suite 1440
Austin, TX 78701
(512) 457-7025
(512) 457-7070 (fax)